

Facility Operating Report Review	
<b>Permittee:</b>	ConocoPhillips Alaska, Inc. (CPAI)
<b>Source:</b>	Alpine Central Processing Facility
<b>Permit No. &amp; Revision No.:</b>	AQ0489TVP02 Rev. 1 AQ0489TVP02 Rev. 2
<b>File No.:</b>	300.16.815
<b>Time Period for Report:</b>	October 1 through December 31, 2018
<b>Date Reviewed:</b>	February 19, 2019
<b>Reviewer:</b>	Breanna Howard – Environmental Program Specialist
<b>Report Postmarked:</b>	February 13, 2019
<b>Compliance Summary:</b>	<b>In Compliance</b>

Permit No. AQ0489TVP02, Rev. 2	
Condition	Compliance Status
<b>1.1</b> For EU IDs 1 through 3, 5, 106, 107, 110, and 518 through 520, burn only gas as fuel. Monitoring for these emission units shall consist of a statement in each operating report under Condition 83 indicating whether each of these emission units fired only gas during the period covered by the report. Report under Condition 82 if any fuel other than gas is burned.	The Permittee reported that only fuel gas was burned in EU IDs 1-3, 5, 106, 107, 110, and 518-520 during the reporting period.  <b><u>In Compliance</u></b>
<b>1.4</b> For EU IDs 4, 108 and 109, use gas as the primary fuel. Monitoring for these emission units shall consist of a statement in each operating report required in Condition 83 indicating whether each of the emission units fired gas as the primary fuel during the period covered by the report. If any unit operated on back-up liquid fuel during the period covered by the report, then the Permittee shall monitor, record, and report according to Condition 14 for that emission unit.	The Permittee reported that EU IDs 4, 108, and 109 burned gas during the reporting period.  <b><u>In Compliance</u></b>
<b>5.1</b> In each operating report under Condition 83, include for the period covered by the report: <b>a.</b> copies of the observation results (i.e., opacity observations) for each emission unit that used the Method 9 Plan, except for the observations the Permittee has already supplied to the Department; and <b>b.</b> a summary to include: <b>(i)</b> number of days observations were made; <b>(ii)</b> highest six- and 18 consecutive minute average opacities observed; <b>(iii)</b> dates when one or more observed six-minute average opacities were greater than 20 percent and; <b>c.</b> a summary of any monitoring required under Condition 2.1 or 3 that was not done or recordkeeping required under Condition 2.2 or 4 that was not done.	The Permittee stated this condition was not triggered during this reporting period because EU IDs 4, 108 and 109 have not burned liquid fuel for more than 400 hours (or any subsequent multiple of 400 hours) during the calendar year to date.  A Method 9 Observation was conducted for EU ID 314 on June 21, 2018, highest 6-min average 0%. Method 9 observations were conducted for EU IDs 1, 2, and 3 on May 23, 2018, highest 6-min average 0%. Method 9 observations were conducted for EU IDs 106 through 109 and 518 on May 23, 2018, highest 6-min average 0%.  <b><u>In Compliance</u></b>

<p><i>EU IDs 415-417</i></p> <p>6. The Permittee shall observe one daylight flare event within 12 months after the preceding flare event observation or within 12 months after the permit effective date, whichever is later. If no flare event exceeds one hour within that 12-month period, then the Permittee shall observe the next daylight flare event.</p> <p><b>6.2</b> Record the following information for observed events:</p> <ul style="list-style-type: none"> <li>a. the flare(s) EU ID number;</li> <li>b. results of the Method-9 observations;</li> <li>c. reason(s) for flaring;</li> <li>d. date, beginning and ending time of event; and</li> <li>e. volume of gas flared.</li> </ul> <p><b>6.3</b> Monitoring of a flare event may be postponed for safety or weather reasons, or because a qualified observer is not available. If more than 12 months have elapsed since the last qualifying flare event was monitored, and monitoring of a flare event is postponed for any of the reasons described in this condition, the Permittee shall include in the next operating report required by Condition 83 an explanation of the reason the event was not monitored. If no flare events occur during a reporting period, then no monitoring or reporting is required.</p> <p><b>6.4</b> Attach copies of the records required by Condition 6.2 with the operating report required by Condition 83 for the period covered by the report.</p>	<p>The Permittee reported EU ID 416 had a flare event on July 7, 2018, highest 6-min average 0%. EU ID 415 had a flare event on July 13, 2018, highest 6-min average was 0%.</p> <p><b><u>In Compliance</u></b></p>
<p><b>7.1</b> For EU IDs 1 through 3, 5, 106, 107, 110, and 518 through 520, burn only gas as fuel. Monitoring for these emission units shall consist of a statement in each operating report under Condition 83 indicating whether each of these emission units fired only gas during the period covered by the report. Report under Condition 82 if any fuel is burned other than gas.</p> <p><b>7.4</b> For EU IDs 4, 108, and 109, use gas as the primary fuel. Monitoring for these emission units shall consist of a statement in each operating report required in Condition 83 indicating whether each of these emission units fired gas as the primary fuel during the period covered by the report. If any unit operated on back-up liquid fuel during the period covered by the report, the Permittee shall monitor, record, and report according to Condition 14 for that emission unit.</p>	<p>The Permittee reported that only fuel gas was burned in EU IDs 1-3, 5, 106, 107, 108, 109, 110, and 518-520 during the reporting period.</p> <p><b><u>In Compliance</u></b></p>
<p><i>For Dual Fuel-Fired Turbines (EU ID 4) while firing liquid fuel and Liquid Fuel-Fired Engines (EU IDs 211, 212, 621, and 622)</i></p> <p><b>10.3</b> In each operating report under Condition 83, include for the period covered by the report:</p>	<p>EU IDs 4, 211, 212, 621, and 622 did not require Method 9 observations during the reporting period. Therefore, the opacity limit in Condition 8.2 was not exceeded and PM source testing was not required.</p> <p><b><u>In Compliance</u></b></p>

<p>a. the dates, EU ID(s), and results when an observed 18-minute average opacity was greater than an applicable threshold in Condition 8.2;</p> <p>b. a summary of the results of any PM testing under Condition 8; and</p> <p>c. copies of any visible emissions observation results (opacity observations) greater than the thresholds of Condition 8.2, if they were not already submitted.</p>	
<p><i>For Dual Fuel-Fired Heaters (EU IDs 108 and 109) while firing liquid fuel</i></p> <p><b>13.1</b> In each operating report required by Condition 83, include for the period covered by the report:</p> <p>a. the dates, EU ID(s), and results when an 18-minute opacity observation was greater than the applicable threshold criterion in Condition 11.2.</p> <p>b. a summary of the results of any PM testing and visible emissions observations conducted under Conditions 11 and 14.</p>	<p>EU IDs 108 and 109 did not require Method 9 readings during the reporting period. Therefore, the opacity limit in Condition 10.2 was not exceeded and PM source testing was not required.</p> <p><b><u>In Compliance</u></b></p>
<p><i>Sulfur Compound Emissions Monitoring, Recordkeeping and Reporting for North Slope Liquid Fuel (EU IDs 4, 108, 109, 211, 212, 621, 622, heaters within EU ID 742, and 839)</i></p> <p><b>15.2</b> Arctic Diesel Fuel: For liquid fuel from a North Slope topping plant, the Permittee shall obtain from the topping plant the results of a monthly fuel sulfur analysis.</p> <p>a. The Permittee shall include in the operating report required by Condition 83, a list of the sulfur content measured for each month covered by the report.</p> <p>b. If the fuel contains greater than 0.75 percent sulfur by weight, the Permittee shall calculate SO<sub>2</sub> emissions in ppm using either the SO<sub>2</sub> material balance calculation in Section 12 or Method 19 of 40 C.F.R. 60, Appendix A-7, adopted by reference in 18 AAC 50.040(a).</p> <p>c. If SO<sub>2</sub> emissions calculated under Condition 15.2b exceed 500 ppm, the Permittee shall report as excess emissions under Condition 82. The report shall document the calculation under Condition 15.2b.</p> <p>d. For fuel with a sulfur content greater than 0.75 percent by weight, the Permittee shall include in the operating report required by Condition 83 the SO<sub>2</sub> emissions in ppm calculated under Condition 15.2b.</p>	<p>The Permittee stated that arctic heating fuel from the North Slope topping plant is no longer combusted at Alpine.</p> <p><b><u>Not Applicable</u></b></p>

<p><b>15.5</b> The Permittee shall:</p> <ul style="list-style-type: none"> <li><b>a.</b> Notify under Condition 82 if SO<sub>2</sub> emissions calculated under Condition 15.4 exceed 500 ppm. The notification shall document the calculation under Condition 15.4.</li> <li><b>b.</b> Include in the operating report required by Condition 83: <ul style="list-style-type: none"> <li><b>(i)</b> a list of the fuel grades received at the stationary source during the reporting period;</li> <li><b>(ii)</b> for any fuel grade with a maximum fuel sulfur content greater than the limit in Condition 20, the fuel sulfur content of each shipment;</li> <li><b>(iii)</b> the results of all fuel sulfur analyses conducted under Conditions 15.3a(ii)(A) and 15.3b during the reporting period and documentation of the method(s) used to complete the analyses; and</li> <li><b>(iv)</b> for fuel with a sulfur content greater than 0.75 percent, the SO<sub>2</sub> emissions in ppm calculated under Condition 15.4.</li> </ul> </li> </ul> <p><b>15.7</b> Keep records as follows:</p> <ul style="list-style-type: none"> <li><b>a.</b> Keep records of the fuel gas sulfur analyses conducted under Condition 15.6 and,</li> <li><b>b.</b> Keep records of each month that any portable flare authorized under this permit operates.</li> </ul> <p><b>15.8</b> The Permittee shall:</p> <ul style="list-style-type: none"> <li><b>a.</b> Notify as excess emissions, in accordance with Condition 82, whenever the fuel combusted causes sulfur compound emissions to exceed the standard of Condition 15 or the H<sub>2</sub>S content of the fuel exceeds the limit in Table D, Table E, or Condition 21.</li> <li><b>b.</b> Include copies of the records required by Condition 15.7 with the operating report required by Condition 83 for each month of the reporting period.</li> </ul>	<p>The Permittee stated that all diesel fuel received at Alpine during the reporting period was ULSD grade fuel.</p> <p>The Permittee provided monthly fuel sulfur content for each month of the reporting period in accordance with Condition 14.5b. The highest fuel sulfur content was 7.5 ppm (0.00075 wt%), well below the 0.11 wt% limit.</p> <p><b><u>In Compliance</u></b></p>
<p><b>16.4 Annual CO BACT Limits (EU IDs 1 through 3).</b> For EU IDs 1 through 3, to demonstrate compliance with the annual (12-month rolling) CO BACT emission limits in Table D, monitor, record, and report as follows:</p> <ul style="list-style-type: none"> <li><b>a.</b> For EU ID 1 (Tag No. CF-C33012-TB), when using a predictive emissions correlation to estimate hourly emissions as allowed under Condition 16.4d(ii), the Permittee shall use a 1-hour averaging period for loads above 40 percent, except during startup and shutdown. During startup and shutdown, the Permittee shall use a time weighted 3-hour averaging period for loads above 40 percent. At the end of 3 hours, the averaging period shall revert to a 1-hour averaging period.<sup>13</sup></li> </ul>	<p>The Permittee reported the monthly and 12-month summation of CO emissions for EU IDs 1-3 for each month during the reporting period. The highest reported CO was in July from EU 1 with 68.7 tons. The CO emissions for each unit did not exceed the 116 tons CO emission limits listed in Table D of the permit.</p> <p><b><u>In Compliance</u></b></p>

<p><b>b.</b> For EU ID 2 (Tag No. CF-G-70001-TB), when using a predictive emissions correlation to estimate hourly emissions as allowed under Condition 16.4d(ii), the Permittee shall use a 1-hour averaging period for loads above 10 percent, except during startup and shutdown. During startup and shutdown, the Permittee shall use a time weighted 3-hour averaging period for electrical loads above 10 percent. At the end of 3 hours, the averaging period shall revert to a 1-hour averaging period</p> <p><b>c.</b> During startup, shutdown, malfunction, mapping of EU ID 3, and for loads not included in Table D, the Permittee shall use the following CO emission rates for calculating the 12-month rolling emissions:</p> <ul style="list-style-type: none"> <li><b>(i)</b> 884 lb/hr for EU ID 1;</li> <li><b>(ii)</b> 145 lb/hr for EU ID 2; and</li> <li><b>(iii)</b> 14.6 lb/hr for EU ID 3.</li> </ul> <p><b>d.</b> The Permittee shall calculate and record the annual (consecutive 12-month) CO emissions for each of EU IDs 1 through 3 as follows:</p> <ul style="list-style-type: none"> <li><b>(i)</b> Determine the time each unit operates each month within the unit-specific load ranges provided in Table D;</li> <li><b>(ii)</b> Multiply the monthly load-specific operating times by the corresponding unit-specific, load-based hourly emission rates using the Permittee's predictive emissions correlation for the specific unit, or the unit-specific emission rates from either Table D or Condition 16.4c, as applicable, and sum the various calculated load-based emission rates to obtain a monthly total CO emission rate for each of EU IDs 1, 2, and 3; then</li> <li><b>(iii)</b> Determine the 12-month rolling total CO emissions for each of EU IDs 1 through 3 by summing the calculated total monthly unit-specific CO emission rates to the unit-specific emission rates calculated for the previous 11-months.</li> </ul> <p><b>e.</b> With each operating report required by Condition 83, report the monthly and the consecutive 12-month summation of CO emissions recorded in Condition 16.4d for each of EU IDs 1 through 3 for each month of the reporting period.</p>	
<p><b>16.6 CO BACT Low Load Operational Restrictions (EU IDs 1 through 3).</b> The Permittee shall limit low-load operation of EU IDs 1 through 3 and document such operations as follows:</p>	<p>The Permittee stated that there were no process upsets during the reporting period.</p> <p><b><u>In Compliance</u></b></p>

<p><b>a.</b> Do not operate EU ID 1 at less than 40 percent load except during startup and shutdown of EU ID 1, and process upsets. During startup, shutdown, and process upsets, operation below 40 percent load shall be limited to 90 minutes per event.</p> <p><b>b.</b> Do not operate EU ID 2 at less than 10 percent electrical load except during startup and shutdown of EU ID 2, and process upsets. During startup, shutdown, and process upsets, operation below 10 percent electrical load shall be limited to 60 minutes per event.</p> <p><b>c.</b> Do not operate EU ID 3 at less than 40 percent electrical load except during startup and shutdown of EU ID 3, process upsets, and during mapping of EU ID 3. During startup, shutdown, and process upsets, operation below 40 percent electrical load shall be limited to 60 minutes per event. During mapping, operation below 40 percent electrical load shall be limited to 180 minutes per event.</p> <p><b>d.</b> Document all process upsets that result in EU IDs 1, 2, and/or 3 operating at less than 40%, 10% and 40% load, respectively, in the operating report required by Condition 83 for the period covered by the report. Each report shall include the cause of the upset, the duration of the upset, and what action was taken to minimize CO emissions.</p> <p><b>e.</b> Record the date, start time, and end time when mapping occurs for EU ID 3.</p>	
<p><b>16.7 NOX BACT Operational Requirements (EU IDs 4 and 5).</b> The Permittee shall limit operations of EU IDs 4 and 5 as follows:16</p> <p><b>a.</b> The Permittee shall operate EU IDs 4 or 5 out of low emissions mode17 for no more than 48 hours in any consecutive 12-month period. The following operating times out of low emissions mode do not count toward the 48 hour limit:</p> <ul style="list-style-type: none"> <li><b>(i)</b> during transient operations of startup and shutdown of EU IDs 2, 4 or 5,</li> <li><b>(ii)</b> turbine intake temperatures less than 0°F,</li> <li><b>(iii)</b> periods of emission testing, and</li> <li><b>(iv)</b> periods when EU ID 4 or 5 operates in lead (isochronous) mode due to EU ID 2 being out of service.</li> </ul> <p><b>b.</b> The Permittee shall not operate EU IDs 4 and 5 in lead (isochronous) mode while EU ID 2 is operating, except during startup and shutdown of EU ID 2, or during required emission testing.</p>	<p>The Permittee submitted the monthly total time and consecutive 12-month total time that each of EU IDs 4 and 5 operated out of low emissions mode. Additionally, the Permittee submitted all the information required by Condition 15.7c.</p> <p>The total time operated out of low emissions mode in any consecutive 12-month period did not exceed 48 hours. Total 12 month rolling time was 5hr 19min through July, August, and September of 2018.</p> <p><b><u>In Compliance</u></b></p>

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| <p><b>c.</b> Monitor the pilot valve command signal to verify operation in low emissions mode. For EU IDs 4 and 5, during each occurrence of operation out of low emissions mode, the Permittee shall record:</p> <ul style="list-style-type: none"><li><b>(i)</b> the date, time, and duration,</li><li><b>(ii)</b> turbine intake temperature,</li><li><b>(iii)</b> gas producer speed,</li><li><b>(iv)</b> T5 temperature,</li><li><b>(v)</b> power level, and</li><li><b>(vi)</b> whether each occurrence is due to:<ul style="list-style-type: none"><li>• startup,</li><li>• shutdown,</li><li>• subzero turbine intake temperatures,</li><li>• periods of required emission testing, or</li><li>• load change when EU ID 4 or 5 is in lead (isochronous<sup>18</sup>) mode due to EU ID 2 being out of service or out of lead (droop<sup>19</sup>) mode.</li></ul></li></ul> <p><b>d.</b> Summarize in the operating report required by Condition 83, the monthly total time and consecutive 12-month total time that each of EU IDs 4 and 5 operate out of low emissions mode for each month of the reporting period. Include in the report the information recorded under Condition 16.7c for each event of operations out of low emissions mode during the reporting period.</p> |  |
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<p><b>16.8 Predictive Correlation Method.</b> If required by Condition 16.7g or elected under Condition 16.4d(ii), the Permittee shall</p> <ul style="list-style-type: none"> <li>a. develop a predictive correlation between NOX or CO emission rates from stack tests and turbine process parameters as follows: <ul style="list-style-type: none"> <li>(v) Include copies of the QA procedures in the operating report required by Condition 83.</li> </ul> </li> </ul>	<p>The Permittee stated that QA procedures are being developed and will be included with the operating report when completed.</p> <p><i>Requested when they will be completed on FCE IR. The response to the FCE IR Letter stated "In the current revision of the permit, Condition 16.8(a)(v) is the requirement to include copies of the QA procedures in the operating report required by Condition 83. QA procedures are expected to be completed roughly on 30 June 2019".</i></p> <p><b><u>In Compliance</u></b></p>
<p><b>16.8(b)(v)</b> For EU IDs 1 through 5. Attach copies of the results of all RM stack tests (including any rejected test results) conducted under Conditions 16.8b(i) and 16.8b(ii) and the final results of the RA test completed under Condition 16.8b(iii), to the operating report required by Condition 83.</p>	<p>The Permittee reported this condition was not triggered during the reporting period.</p> <p>The Permittee reported RM source testing was completed October 4, 2017. The test results were included in the 4Q17 operating report.</p> <p><b><u>In Compliance</u></b></p>
<p><b>16.9 CO BACT Operational Requirements (EU IDs 4 and 5).</b> For EU IDs 4 and 5:</p> <ul style="list-style-type: none"> <li>a. Except during startup, shutdown, and periods of required emission testing, limit operation of EU IDs 4 and 5 at less than 45 percent load to no greater than 316 combined hours in any 12 consecutive months.</li> <li>b. Calculate the 12-month combined rolling total operating time at less than 45 percent load, excluding operating during startup, shutdown, and periods of required emission testing.</li> <li>c. Report the 12-month combined rolling total hours calculated in Condition 16.9b in the operating report required by Condition 83 for each month of the reporting period.</li> <li>d. Report under Condition 82 if operation of EU IDs 4 and 5 exceeds the limit of Condition 16.9a.</li> </ul>	<p>The Permittee reported the 12-month rolling total hours calculated in Condition 16.9b. The hours did not exceed the 316 combined hour limit.</p> <p><b><u>In Compliance</u></b></p>



<p><b>17.2(d) PM (opacity) – Backup Liquid Fuel.</b> For EU IDs 108 and 109, indicate in each operating report required in Condition 83 whether each of these emission units fired only gas during the period covered by the report. If operation on back-up liquid fuel occurred during the period covered by the report, the Permittee shall monitor, record, and report according to Condition 14 to demonstrate compliance with the short-term heater BACT PM (opacity) limit in Table E that applies when these units are fired on backup liquid fuel.</p>	<p>The Permittee reported that EU IDs 108 and 109 fired only fuel gas during the reporting period but have not burned liquid fuel for more than 400 hours (or any subsequent multiple of 400 hours) during the calendar year to date.</p> <p><b><u>In Compliance</u></b></p>
<p><b>19.6 Reporting – Operating Report.</b> Submit with the operating report required under Condition 83 for the period covered by the report:</p> <p><b>a.</b> Copies of records required under Conditions 19.3c, and 19.4; and</p> <p><b>b.</b> The dates that informal VE observations per Condition 19.2 were made, and the dates, if any, that a Method 22 VE per Condition 19.3 was observed.</p>	<p>An informal Method 22 observation was taken for EU ID 415 and 416 on October 6, 2018, November 5, 2018, and December 7, 2018. No visible emissions were observed.</p> <p><b><u>In Compliance</u></b></p>
<p><b>23. Hours of Operation MR&amp;R for Fuel-Fired Emission Units.</b> The Permittee shall monitor, record, and report the total (emergency and non-emergency) hours of operation as follows:</p> <p><b>23.1</b> Monitor and record the monthly total operating time (all fuel types) for each of EU IDs 1 through 5, 106 through 110, 211, 212, 313, 314, 415, 416, 518 through 520, 621, 622, and 839.</p> <p><b>23.2</b> Monitor and record the rolling 12-month total hours of operation during which each of EU IDs 4 and 5 were fired on lean fuel gas.</p> <p><b>23.3</b> Monitor and record the rolling 12-month total hours of operation during which each of dual fuel-fired emission units, EU IDs 4, 108, and 109 were fired on liquid fuel.</p> <p><b>23.4</b> Monitor and record the rolling 12-month total hours of operation for each of EU IDs 211, 212, 313, 314, and 621.</p> <p><b>23.5</b> Monitor and record the calendar year total hours of operation for each of EU IDs 211, 212, 621, and 622.</p> <p><b>23.6</b> Report using the operating report required under Condition 83, the data recorded in Conditions 23.1 through 23.5 for each month of the reporting period.</p>	<p>The Permittee submitted the information required by Conditions 23.1 through 23.4. The limits of Table G were not exceeded.</p> <p><b><u>In Compliance</u></b></p>

<p><b>24.3</b> Report using the operating report under Condition 83, the monthly total fuel consumption for each fuel type (MMscf/month and/or gallons/month) for each of EU IDs 1 through 5, 106 through 110, 211, 212, 313, 314, 415, 416, 417, 518 through 520, 621, 622, 742, 743, and 839 for each month of the reporting period.</p> <p><b>24.4</b> Report using the operating report under Condition 83, the maximum daily combined total fuel consumption (gallons) for EU IDs 742 and 743 at CD-1 and CD-2, combined, and all daily total fuel consumption values in excess of the daily limit found in Condition 22, if applicable, for each month of the reporting period.</p> <p><b>24.5</b> Report using the operating report under Condition 83, the 12 consecutive month total fuel consumption (gallons) for each of EU IDs 742 and 743 at CD-1, CD-2, CD-3, and CD-4, combined, for each month of the reporting period.</p> <p><b>24.6</b> For EU ID 417:</p> <ul style="list-style-type: none"> <li><b>a.</b> Monitor and keep the following records of portable flare operations at CD-1, CD-2, CD-3 and CD-4. <ul style="list-style-type: none"> <li><b>(i)</b> The location, date and time of startup and completion for each portable flare and whether simultaneous portable flare operations occurred on a single pad, and</li> <li><b>(ii)</b> The quantity of gas combusted during each flaring event, average temperature and pressure, corrected quantity of gas combusted each month (MMscf), and twelve consecutive month total gas burned in all portable flares (MMscf). The fuel use may be estimated by measurement techniques and calculations approved by the Department.</li> </ul> </li> <li><b>b.</b> Include in the operating report required under Condition 83, the data recorded in Conditions 24.6a(i) through 24.6a(ii) to illustrate the compliance status with the operating limit tabulated in Table G that applies to EU ID 417 for each month of the reporting period.</li> </ul>	<p>The Permittee submitted the monthly total fuel consumption for each fuel type and EU ID for each month during the reporting period.</p> <p>The Permittee reported the maximum daily combined total fuel consumption for EU IDs 742 and 743.</p> <p>The Permittee reported the 12-consecutive month total fuel consumption for EU IDs 742 and 743.</p> <p>The limits of Table G were not exceeded.</p> <p><b><u>In Compliance</u></b></p>
<p><b>26.3</b> The Permittee shall report with each operating report required by Condition 83, the following information for any month when well maintenance has occurred and live crude oil has been sent to EU ID 946:</p> <ul style="list-style-type: none"> <li><b>a.</b> The monthly and rolling 12-month total VOC emissions estimated in Condition 26.2 at CD-1, CD-2, CD-3, and CD-4;</li> <li><b>b.</b> The input and output from simulation models and software; and</li> <li><b>c.</b> All calculations and assumptions used.</li> </ul>	<p>The Permittee reported no well maintenance flowbacks occurred during the reporting period.</p> <p>The Permittee reported EU ID 946, CD1 through CD4 had 0.0 VOC Emissions through the reporting period.</p> <p><b><u>In Compliance</u></b></p>

<p><b>27.4 General MR&amp;R for Insignificant Emission Units</b></p> <ul style="list-style-type: none"> <li><b>a.</b> The Permittee shall submit the certification of compliance of Condition 84 based on reasonable inquiry;</li> <li><b>b.</b> The Permittee shall comply with the requirements of Condition 65;</li> <li><b>c.</b> The Permittee shall report in the operating report required by Condition 83 if an emission unit has historically been classified as insignificant because of actual emissions less than the thresholds of 18 AAC 50.326(e) and current actual emissions become greater than any of those thresholds; and</li> <li><b>d.</b> No other monitoring, recordkeeping or reporting is required, except as indicated otherwise within the permit.</li> </ul>	<p>The Permittee reported that this Condition was not triggered.</p> <p><b><u>In Compliance</u></b></p>
<p><b>38.3 Reporting.</b> For EU IDs 1 through 5, the Permittee shall report as follows:</p> <ul style="list-style-type: none"> <li><b>a.</b> In each operating report under Condition 83 the Permittee shall list for each turbine tested or represented by testing at less than maximum load and for which the Permittee must limit load under Condition 38.1c(iii): <ul style="list-style-type: none"> <li><b>(i)</b> the load limit;</li> <li><b>(ii)</b> the turbine identification; and</li> <li><b>(iii)</b> the highest load recorded under Condition 38.2a during the period covered by the operating report.</li> </ul> </li> <li><b>b.</b> In each operating report under Condition 83 for each turbine for which Condition 38.1 has not been satisfied because the turbine normally operates less than 400 hours in any 12 consecutive months, the Permittee shall identify <ul style="list-style-type: none"> <li><b>(i)</b> the turbine;</li> <li><b>(ii)</b> the highest number of operating hours for any 12 consecutive months ending during the period covered by the report; and</li> <li><b>(iii)</b> any turbine that operated for 400 or more hours.</li> </ul> </li> </ul>	<p>The Permittee stated this condition was not triggered during this reporting period.</p> <p><b><u>In Compliance</u></b></p>

<p><b>39. NSPS Subpart GG Sulfur Standard.</b> The Permittee shall not allow the sulfur content of the fuel burned in EU IDs 1 through 5 to exceed 0.8 percent by weight.</p> <p><b>39.3 Reporting -</b> The Permittee shall:</p> <ul style="list-style-type: none"> <li><b>a.</b> for each affected unit for which the Permittee periodically determines the fuel sulfur content under Condition 39.1a, 39.1c, or 39.1d: <ul style="list-style-type: none"> <li><b>(i)</b> semi-annually report the results of all sulfur monitoring to EPA and send a copy to the Department by the 30th day following the end of each 6-month period, except as otherwise approved by a custom fuel monitoring schedule;</li> <li><b>(ii)</b> include with the report submitted under Condition 39.3a(i) a report of excess emissions and monitoring system downtime in accordance with 40 C.F.R. 60.7(c) as summarized in Condition 30 and as defined under 40 C.F.R. 60.334(j)(2). Excess emissions shall be reported for all periods of unit operation, including startup, shutdown, and malfunction.</li> <li><b>(iii)</b> If periodic fuel gas sulfur monitoring is not required because the demonstration under Condition 39.1b has been made, fuel gas sulfur reporting under Conditions 30, 31, and this condition is not required.</li> </ul> </li> <li><b>b.</b> include a copy of the records required by Condition 39.2 with the operating report required by Condition 83 for the period covered by the report; and</li> </ul>	<p>A demonstration that the fuel gas burned by EUs 1-3 meets the definition of natural gas found in 40 CFR 60.331(u) was submitted to EPA on February 11, 2005 and May 11, 2005.</p> <p>A June 30, 2005 letter from EPA outlining a Custom Fuel Monitoring Schedule for Alpine under NSPS Subpart GG states, “has adequately demonstrated to the EPA that Alpine gaseous fuel meets the definition of natural gas.”</p> <p>All turbines at Alpine (EUs 1-5) are fired using the same gaseous fuel.</p> <p>See Attachment 1, Part A for liquid fuel sulfur content lab reports.</p> <p><b><u>In Compliance</u></b></p>
<p><b>46.5 Reporting.</b> The Permittee shall report as follows:</p> <ul style="list-style-type: none"> <li><b>a.</b> For EU IDs 211, 212, and 621 include in the operating report required by Condition 83 a report of Subpart ZZZZ deviations as defined in 40 C.F.R. 63.6675 and of each instance in which an applicable requirement in 40 C.F.R. 63, Subpart A (Table 8 of Subpart ZZZZ) was not met.</li> </ul>	<p>The Permittee reported that no Subpart ZZZZ deviations occurred during the reporting period.</p> <p><b><u>In Compliance</u></b></p>
<p><b>48.4</b> Quarterly calculate the percentage of dry sewage sludge incinerated in each of EU IDs 313 and 314. Report the calculated percentage of dry sewage sludge combusted in the operating report required by Condition 83 for the period covered by the report.</p>	<p>The Permittee reported the following quarterly percentages of dry sewage sludge incinerated at the facility:</p> <p>EU ID 313: 0% EU ID 314: 0%</p> <p>The percentages of dry sewage sludge incinerated during the reporting period did not exceed the 10% limit.</p> <p><b><u>In Compliance</u></b></p>

<p><b>49.3</b> Quarterly calculate the percentage of hospital/medical/infectious waste incinerated in each of EU IDs 313 and 314. Report the calculated percentage of hospital/medical/infectious waste combusted in the operating report required by Condition 83 for the period covered by the report.</p>	<p>The Permittee submitted the following quarterly percentage of hospital/medical/infectious waste incinerated at the facility:</p> <p>EU ID 313: 0% EU ID 314: 0%</p> <p>The percentages of hospital/medical/infectious waste incinerated during the reporting period did not exceed the 10% limit.</p> <p><b><u>In Compliance</u></b></p>
<p><b>50.3</b> Calculate the percentage of municipal solid waste or refuse-derived fuel incinerated quarterly in each of EU IDs 313 and 314. Report the calculated percentage of municipal solid waste or refuse-derived fuel combusted in the operating report required by Condition 83 for the period covered by the report.</p>	<p>The Permittee submitted the following percentages of municipal solid waste or refuse-derived fuel incinerated at the facility:</p> <p>EU ID 313: 80% EU ID 314: 80%</p> <p>The percentages of municipal solid waste or refuse-derived fuel incinerated compared to all fuels and wastes burned was greater than 30%.</p> <p><b><u>In Compliance</u></b></p>
<p><b>65.5 Reporting.</b> With each operating report required under Condition 83, and for the period covered by the report, the Permittee shall include a brief summary report which must include:</p> <ul style="list-style-type: none"> <li>a. the number of complaints received;</li> <li>b. the number of times the Permittee or the Department found corrective action necessary;</li> <li>c. the number of times action was taken on a complaint within 24 hours; and</li> <li>d. the status of corrective actions the Permittee or Department found necessary that were not taken within 24 hours.</li> </ul>	<p>The Permittee reported that no public complaints were received during the reporting period. Additionally, no public complaints were reported in AT.</p> <p><b><u>In Compliance</u></b></p>
<p><b>79. Certification.</b> The Permittee shall certify any permit application, report, affirmation, or compliance certification submitted to the Department and required under the permit by including the signature of a responsible official for the permitted stationary source following the statement:</p>	<p>The report was certified by Responsible Official, Philip Susen. The Department recognized Mr. Susen as a Responsible Official on June 1, 2016.</p>

<p>“Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.” Excess emission reports must be certified either upon submittal or with an operating report required for the same reporting period. All other reports and other documents must be certified upon submittal.</p>	<p><b><u>In Compliance</u></b></p>
<p><b>83. Operating Reports.</b> During the life of this permit, the Permittee shall submit to the Department an operating report by May 15 for the period January 1 to March 31, by August 15 for the period April 1 to June 30, by November 15 for the period July 1 to September 30, and by February 15 for the period October 1 to December 31 of the previous year.</p> <p><b>83.1</b> The operating report must include all information required to be in operating reports by other conditions of this permit, for the period covered by the report.</p> <p><b>83.2</b> When excess emissions or permit deviations that occurred during the reporting period are not included with the operating report under Condition 83.1, the Permittee shall identify</p> <ul style="list-style-type: none"> <li>a. the date of the deviation;</li> <li>b. the equipment involved;</li> <li>c. the permit condition affected;</li> <li>d. a description of the excess emissions or permit deviation; and</li> <li>e. any corrective action or preventive measures taken and the date(s) of such actions.</li> </ul>	<p>The Permittee submitted the operating report on February 13, 2019.</p> <p>The Permittee stated no excess emissions or permit deviations occurred during the reporting period.</p> <p>The Permittee stated no additional testing or monitoring was triggered during the reporting period.</p> <p>The operating report included all information required by other conditions of this permit.</p> <p><b><u>In Compliance</u></b></p>
<p><b>83.4</b> The operating report must include for the period covered by the report a listing of emissions monitored under Conditions 3.1e, 8.2, and 38.1a which trigger additional testing or monitoring, whether or not the emissions monitored exceed an emission standard. The Permittee shall include in the report.</p> <ul style="list-style-type: none"> <li>a. the date of the emissions;</li> <li>b. the equipment involved;</li> <li>c. the permit condition affected; and</li> <li>d. the monitoring result which triggered the additional monitoring.</li> </ul>	<p>The Permittee reported no PDs or EEs occurred this quarter.</p> <p><b><u>In Compliance</u></b></p>
<p><b>83.5</b> Transition from expired to renewed permit. For the first period of this renewed operating permit, also provide the previous permit’s operating report elements covering that partial period immediately preceding the effective date of this renewed permit.</p>	<p>There was no transitional period during the evaluation period.</p> <p><b><u>Not Applicable</u></b></p>
<p><b>85.1 Reports:</b> Except for Federal reports and notices submitted through EPA’s CDX-CEDRI on-line reporting system, attach to the operating report required by</p>	<p>The Permittee stated that ADEC was copied on all NSPS and NESHAP reports</p>

Condition 83 a copy of any NSPS and NESHAPs notification and report submitted to the U.S. Environmental Protection Agency (EPA) Region 10 during the period covered by the operating report unless a copy has already been provided to the Department; and	submitted to the EPA during the reporting period.  <b><u>In Compliance</u></b>
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